

Ashley M. Simonsen (Bar No. 275203)
COVINGTON & BURLING LLP
1999 Avenue of the Stars
Los Angeles, California 90067
Telephone: (424) 332-4800
Facsimile: (424) 332-4749
Email: asimonsen@cov.com

*Attorneys for Defendants Meta Platforms, Inc.
f/k/a Facebook, Inc.; Facebook Holdings, LLC;
Facebook Operations, LLC; Meta Payments, Inc.
f/k/a Facebook Payments, Inc.; Meta Platforms
Technologies, LLC f/k/a Facebook Technologies,
LLC; Instagram, LLC; and Siculus LLC f/k/a
Siculus, Inc.*

*[Additional parties and counsel listed on
signature pages]*

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

IN RE: SOCIAL MEDIA ADOLESCENT
ADDICTION/PERSONAL INJURY PRODUCTS
LIABILITY LITIGATION

This Document Relates To:

ALL ACTIONS

MDL No. 3047

Case No.: 4:22-md-03047-YGR

**OMNIBUS SEALING STIPULATION IN
CONNECTION WITH PLAINTIFFS'
OPPOSITIONS TO RULE 702 MOTIONS
AND EXHIBITS THERETO, SCHOOL
DISTRICT-SPECIFIC MSJ OPPOSITIONS
AND EXHIBITS THERETO, AND
OMNIBUS MSJ OPPOSITION BRIEF**

Judge: Hon. Yvonne Gonzalez Rogers
Magistrate Judge: Hon. Peter H. Kang

Pursuant to Civil Local Rules 7-11 and 79-5, this Court’s Order Setting Sealing Procedures (“Sealing Protocol”) (ECF 341) and the Parties’ Stipulation to Modify Sealing Order With Respect to Motions Set for Hearing on January 26, 2026 (ECF 2451), and Case Management Order No. 28 (ECF 2336), Plaintiffs and Defendants Meta Platforms, Inc. f/k/a Facebook, Inc., Facebook Holdings, LLC, Facebook Operations, LLC, Facebook Payments, Inc., Facebook Technologies, LLC, Instagram, LLC, and Siculus, Inc. (“Meta”); TikTok Inc., ByteDance Inc., ByteDance Ltd., TikTok Ltd., and TikTok LLC (“TikTok”); Snap Inc. (“Snap”); and YouTube, LLC and Google LLC (“YouTube”) (each a “Defendant,” and collectively the “Defendants”) submit this Omnibus Sealing Stipulation in connection with materials filed by Plaintiffs with their oppositions to Defendants’ motions for summary judgment (“MSJs”) and Rule 702 motions (filed September 30 and set for hearing on January 26).¹

Of those materials, Defendants request to seal certain information in Plaintiffs’ Response to Defendants’ Motion to Exclude General Causation Testimony of Plaintiffs’ Experts (ECF 2404); School District/Local Government Entity Plaintiffs’ Opposition to Defendants’ Motion to Exclude Testimony of School District Experts (ECF 2406); Plaintiffs’ Opposition to Defendants’ Motion to Exclude Plaintiffs’ Experts’ General Causation Opinions for Failure to Account for Section 230 and the First Amendment (ECF 2408); Plaintiff Harford County Board of Education’s (“Harford’s”) Opposition to Defendants’ Motion for Summary Judgment (SD MSJ No. 6) (ECF 2395); and Plaintiffs’ Corrected Omnibus Opposition to Defendants’ Motions for Summary Judgment (ECF 2414-1).

As set forth below, Plaintiffs oppose certain requests to seal and do not oppose others. The Parties agree that the filings otherwise need not be maintained under seal. The following two charts set forth (1) the documents for which Defendants’ proposed redactions are undisputed and (2) the documents for which

¹ These materials include Plaintiffs’ oppositions to Defendants’ Rule 702 motions and exhibits thereto; their school district-specific oppositions to Defendants’ MSJs and exhibits thereto; and Plaintiffs’ Omnibus Opposition to Defendants’ MSJs (ECF 2414-1) (the “Omnibus Opposition Brief”)—in other words, all materials filed by Plaintiffs on November 7 except the exhibits to the Omnibus Opposition Brief. Those exhibits, along with Defendants’ opening and reply filings, will be addressed in a future omnibus stipulation regarding sealing and omnibus sealing motions. *See* ECF 2451 at 2.

Defendants' proposed redactions are disputed:²

I. Documents for Which Defendants' Proposed Redactions Are Undisputed

Document	Portion to be Sealed	Designating Party	Basis for Sealing	Whether Previously Sealed
Plaintiffs' Response to Defendants' Motion to Exclude General Causation Testimony of Plaintiffs' Experts, ECF 2404 – Ex. 90	Names of deponent's family members and their places of business, appearing at pages 470, 758, 894, 925-26, 928, 946-48, 951	Meta	Sealing will protect the privacy interests of these non-party individuals. <i>See AAA of N. Cal., Nev. & Utah v. GM LLC</i> , 2019 WL 1206748, at *2 (N.D. Cal. Mar. 14, 2019) (on summary judgment, sealing "[PII] of third-party individuals, including names" to protect privacy and other interests); <i>Opperman v. Path, Inc.</i> , 2017 WL 1036652, at *4 (N.D. Cal. Mar. 17, 2017) (on summary judgment, sealing names of non-parties under compelling-reasons standard); <i>Zeiger v. WellPet LLC</i> , 526 F. Supp. 3d 652, 699 (N.D. Cal. 2021) (same); <i>Hunt v.</i>	This Court has previously granted motions to seal the names of non-parties and non-executive employees to protect their privacy. <i>See</i> ECF 735, 189, 1465, 1619, 2522.

² The Sealing Protocol directs the Parties to attach lesser-redacted versions of documents that are the subject of the omnibus sealing stipulation to the stipulation. ECF 341 at 5. In CMO 29, however, the Court directed the Parties to unseal information "immediately once the parties agree that a document, or information redacted from a document, should not be sealed." ECF 2336 at 2. Following the Parties' conferrals on Defendants' requested redactions, Plaintiffs requested that Defendants apply those modified redactions to the materials and provide the materials to Plaintiffs for re-filing, which they have done. Accordingly, the Parties do not attach the lesser-redacted versions of those documents here; Plaintiffs expect to re-file them in the coming days.

			<i>Cont'l Cas. Co.</i> , 2015 WL 5355398, at *2 (N.D. Cal. Sept. 14, 2015) (sealing names because disclosure “implicates important privacy concerns of nonparties—whose names are not relevant to the disposition of this case”)	
Plaintiffs’ Response to Defendants’ Motion to Exclude General Causation Testimony of Plaintiffs’ Experts, ECF 2404 – Ex. 93	Name of deponent’s partner, appearing at page 83	Meta	See above	This Court has previously granted motions to seal the names of non-parties and non-executive employees to protect their privacy. <i>See</i> ECF 735, 189, 1465, 1619, 2522.
Plaintiffs’ Response to Defendants’ Motion to Exclude General Causation Testimony of Plaintiffs’ Experts, ECF 2404 – Ex. 95	Video compilation containing the first names, ages, faces, and social media aliases of young children (mostly girls), most of whom identify themselves as under 13 (entire video exhibit)	Meta	See above; <i>see also, e.g., Bois v. Levi Strauss & Co.</i> , 2024 WL 4004045, at *2 (N.D. Cal. Feb. 22, 2024) (approving “sealing . . . information regarding minor children”); <i>Harvey v. Means</i> , 2023 WL 8188681, at *2 (W.D. Wash. Nov. 27, 2023) (“sealing photos of . . . children . . . serves a compelling privacy interest of protecting minor children”)	This Court has previously granted motions to seal the names of non-parties to protect their privacy. <i>See</i> ECF Nos. 735, 189, 1465, 1619, 2522.
Harford School District Opposition to	Name of the family member of an expert witness	Meta	See above	This Court has previously granted motions to seal the names

Motion for Summary Judgment, ECF 2395 – Ex. 20	appearing at page 131			of non-parties to protect their privacy. <i>See</i> ECF Nos. 735, 189, 1465, 1619, 2522.
Plaintiffs’ Opposition to Defendants’ Harford Motion for Summary Judgment, ECF 2400-18 – Ex. 16 (Christakis MDL Expert Report)	Page 315: Images of children	YouTube	The images are of non-party children identified in an internal YouTube document as being connected to a “predatory account.” The images are not referenced in any parties’ motion, nor are they relevant to the resolution thereof. The images should be sealed to protect the children’s privacy. <i>See, e.g., Prasad v. Simmons</i> , 2019 WL 294760, at *2 (N.D. Cal. Jan. 23, 2019) (sealing documents regarding child abuse).	To YouTube’s knowledge, no party has previously sought to seal this information
Plaintiffs’ Opposition to Defendants’ Motion to Exclude Plaintiffs’ School District Experts, ECF 2407-3 – Ex. 1 (Christakis MDL Expert Report)	Page 315: Images of children.	YouTube	The images are of non-party children identified in an internal YouTube document as being connected to a “predatory account.” The images are not referenced in any parties’ motion, nor are they relevant to the resolution thereof. The images should be sealed to protect the children’s privacy. <i>See, e.g., Prasad v. Simmons</i> , 2019	To YouTube’s knowledge, no party has previously sought to seal this information

			WL 294760, at *2 (N.D. Cal. Jan. 23, 2019) (sealing documents regarding child abuse).	
Plaintiffs’ Corrected Omnibus Opposition to Defendants’ Motions for Summary Judgment, ECF 2414-1	Page 139: DAU Increase number	Snap	The metric reflects Snap’s confidential analysis of how changes to notification timing affected user engagement. <i>See Cont’l Auto. Sys., Inc. v. Avanci, LLC</i> , 2019 WL 6612012, at *4 (N.D. Cal. Dec. 5, 2019) (sealing “number of customers using Plaintiff’s products”); <i>Epic Games, Inc. v. Apple Inc.</i> , 2021 WL 1907755, at *3 (N.D. Cal. May 12, 2021) (protecting “sensitive and confidential. . . user and platform data”); <i>Daybreak Game Co. v. Takahashi</i> , 2025 WL 2689920, at *2 (S.D. Cal. Sept. 19, 2025) (sealing user-engagement metrics to avoid competitive harm). Declaration of Abby Tran ¶ 4	To Snap’s knowledge, no party has previously sought to seal this specific information.
Plaintiffs’ Corrected Omnibus Opposition to Defendants’ Motions for	Page 140: Percentage of ad revenue generated from Stories tab	Snap	The metric reflects confidential, non-public data quantifying the contribution of	To Snap’s knowledge, no party has previously sought to seal this specific information.

1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25 26 27 28	Summary Judgment, ECF 2414-1			the Stories tab to Snap's advertising revenue and revealing the commercial strength of that feature. <i>Monster Energy Co. v. Vital Pharms., Inc.</i> , 2019 WL 3099711, at *2 (C.D. Cal. June 17, 2019) ("Courts . . . routinely find that non-public financial, pricing, and strategy information could harm litigants' competitive standing and grant motions to seal such information."); <i>Unlockd Media, Inc. Liquidation Tr. v. Google LLC</i> , 2022 WL 4624985, at *2 (N.D. Cal. Sept. 30, 2022) (granting plaintiff's motion to seal portions of complaint containing specific revenue information about its advertising products because disclosure could give competitors unfair advantage in development	
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			and negotiations of rival products).	
			Declaration of Abby Tran ¶ 5	
Plaintiffs' Corrected Omnibus Opposition to Defendants' Motions for Summary Judgment, ECF 2414-1	Page 142: Percentage of friendship requests sent by new users attributed to the Quick Add feature	Snap	The metric reflects confidential, non-public data showing how Snap's Quick Add feature contributes to friending activity and reveals the effectiveness of a particular user-growth mechanism. <i>See Cont'l Auto. Sys., Inc.</i> , 2019 WL 6612012, at *4; <i>Epic Games, Inc.</i> , 2021 WL 1907755, at *3; <i>Daybreak Game Co.</i> , 2025 WL 2689920, at *2. Declaration of Abby Tran ¶ 6	To Snap's knowledge, no party has previously sought to seal this specific information.
Plaintiffs' Corrected Omnibus Opposition to Defendants' Motions for Summary Judgment, ECF 2414-1	Page 142: Number of daily friend requests sent via Quick Add	Snap	The metric reflects confidential, non-public data showing how Snap's Quick Add feature contributes to friending activity and reveals the effectiveness of a particular user-growth mechanism. <i>See Cont'l Auto. Sys., Inc.</i> , 2019 WL 6612012, at *4;	To Snap's knowledge, no party has previously sought to seal this specific information.

			<i>Epic Games, Inc.</i> , 2021 WL 1907755, at *3; <i>Daybreak Game Co.</i> , 2025 WL 2689920, at *2. Declaration of Abby Tran ¶ 6	
Plaintiffs' Corrected Omnibus Opposition to Defendants' Motions for Summary Judgment, ECF 2414-1	Page 142: Percentage of daily friend requests sent via Quick Add	Snap	The metric reflects confidential, non-public data showing how Snap's Quick Add feature contributes to friending activity and reveals the effectiveness of a particular user-growth mechanism. <i>See Cont'l Auto. Sys., Inc.</i> , 2019 WL 6612012, at *4; <i>Epic Games, Inc.</i> , 2021 WL 1907755, at *3; <i>Daybreak Game Co.</i> , 2025 WL 2689920, at *2. Declaration of Abby Tran ¶ 6	To Snap's knowledge, no party has previously sought to seal this specific information.
Plaintiffs' Opposition to Defendants' Harford Motion for Summary Judgment, ECF No. 2400-18 – Ex. 16 (Christakis MDL Expert Report)	Page 96: Employee email addresses Page 147: Employee email address; Page 151: Employee email addresses Page 152: Employee email address	Snap	There is good cause to seal non-deponent employee names and all employee email addresses to protect their privacy interests at this time. <i>See, e.g., Murphy v. Kavo Am. Corp.</i> , 2012 WL 1497489, at *1, *2 (N.D. Cal.	To Snap's knowledge, no party has previously sought to seal this specific information.

Apr. 27, 2012)
 (granting motion
 to seal
 “employee-
 identifying
 information”
 because
 “[e]mployees and
 former employees
 who are not
 parties to this
 litigation have
 privacy interests
 in their personnel
 information, and
 in other sensitive
 identifying
 information”)
 (Gonzalez
 Rogers, J.); *see*
also, e.g., Am.
Auto. Ass’n of N.
California,
Nevada & Utah v.
Gen. Motors
LLC, 2019 WL
 1206748, at *2
 (N.D. Cal. Mar.
 14, 2019);
Opperman v.
Path, Inc., 2017
 WL 1036652, at
 *4 (N.D. Cal.
 Mar. 17, 2017);
Hunt v. Cont’l
Cas. Co., 2015
 WL 5355398, at
 *2 (N.D. Cal.
 Sept. 14, 2015).
 Sealing this
 information is
 consistent with
 the Court’s
 approach to
 sealing employee
 names in the
 Personal Injury
 Plaintiffs’ Master
 Complaint and
 the multistate
 Attorney General
 Complaint. *See*
 ECF No. 189;
 Case No. 4:23-cv-
 05448-YGR, ECF

			<p>No. 77. Sealing this information is further warranted to protect the employees' safety. <i>Cf. Campbell v. Grounds</i>, 2022 WL 14151744, at *1 (N.D. Cal. Oct. 24, 2022) (sealing witness name and finding standard met when disclosure "could put at risk the safety of one or more individuals if made public").</p> <p>Declaration of Jennifer Boden ¶¶ 2–4</p>	
<p>Plaintiffs' Opposition to Defendants' Motion to Exclude Plaintiffs' General Causation Experts, ECF 2405-18 – Ex. 15 (Christakis MDL Expert Report)</p>	<p>Page 96: Employee email addresses</p> <p>Page 147: Employee email address</p> <p>Page 151: Employee email addresses</p> <p>Page 152: Employee email address</p>	Snap	<p>There is good cause to seal non-deponent employee names and all employee email addresses to protect their privacy interests at this time. <i>See, e.g., Murphy v. Kavo Am. Corp.</i>, 2012 WL 1497489, at *1, *2 (N.D. Cal. Apr. 27, 2012) (granting motion to seal "employee-identifying information" because "[e]mployees and former employees who are not parties to this</p>	<p>To Snap's knowledge, no party has previously sought to seal this specific information.</p>

litigation have privacy interests in their personnel information, and in other sensitive identifying information”) (Gonzalez Rogers, J.); *see also, e.g., Am. Auto. Ass’n of N. California, Nevada & Utah v. Gen. Motors LLC*, 2019 WL 1206748, at *2 (N.D. Cal. Mar. 14, 2019); *Opperman v. Path, Inc.*, 2017 WL 1036652, at *4 (N.D. Cal. Mar. 17, 2017); *Hunt v. Cont’l Cas. Co.*, 2015 WL 5355398, at *2 (N.D. Cal. Sept. 14, 2015). Sealing this information is consistent with the Court’s approach to sealing employee names in the Personal Injury Plaintiffs’ Master Complaint and the multistate Attorney General Complaint. *See* ECF No. 189; Case No. 4:23-cv-05448-YGR, ECF No. 77. Sealing this information is further

			warranted to protect the employees' safety. <i>Cf. Campbell v. Grounds</i> , 2022 WL 14151744, at *1 (N.D. Cal. Oct. 24, 2022) (sealing witness name and finding standard met when disclosure "could put at risk the safety of one or more individuals if made public"). Declaration of Jennifer Boden ¶¶ 2–4	
Plaintiffs' Opposition to Defendants' Motion to Exclude Plaintiffs' General Causation Experts, ECF 2405-35 – Ex. 32 (Murray MDL Expert Report)	Page 170: Employee email address	Snap	There is good cause to seal non-deponent employee names and all employee email addresses to protect their privacy interests at this time. <i>See, e.g., Murphy v. Kavo Am. Corp.</i> , 2012 WL 1497489, at *1, *2 (N.D. Cal. Apr. 27, 2012) (granting motion to seal "employee-identifying information" because "[e]mployees and former employees who are not parties to this litigation have	To Snap's knowledge, no party has previously sought to seal this specific information.

privacy interests in their personnel information, and in other sensitive identifying information”) (Gonzalez Rogers, J.); *see also, e.g., Am. Auto. Ass’n of N. California, Nevada & Utah v. Gen. Motors LLC*, 2019 WL 1206748, at *2 (N.D. Cal. Mar. 14, 2019); *Opperman v. Path, Inc.*, 2017 WL 1036652, at *4 (N.D. Cal. Mar. 17, 2017); *Hunt v. Cont’l Cas. Co.*, 2015 WL 5355398, at *2 (N.D. Cal. Sept. 14, 2015). Sealing this information is consistent with the Court’s approach to sealing employee names in the Personal Injury Plaintiffs’ Master Complaint and the multistate Attorney General Complaint. *See* ECF No. 189; Case No. 4:23-cv-05448-YGR, ECF No. 77. Sealing this information is further warranted to

			<p>protect the employees' safety. <i>Cf. Campbell v. Grounds</i>, 2022 WL 14151744, at *1 (N.D. Cal. Oct. 24, 2022) (sealing witness name and finding standard met when disclosure "could put at risk the safety of one or more individuals if made public").</p> <p>Declaration of Jennifer Boden ¶¶ 2–4</p>	
<p>Plaintiffs' Opposition to Defendants' Motion to Exclude Plaintiffs' School District Experts, ECF No. 2407-03 – Ex. 1 (Christakis MDL Expert Report)</p>	<p>Page 96: Employee email addresses</p> <p>Page 147: Employee email address</p> <p>Page 151: Employee email addresses</p> <p>Page 152: Employee email address</p>	Snap	<p>There is good cause to seal non-deponent employee names and all employee email addresses to protect their privacy interests at this time. <i>See, e.g., Murphy v. Kavo Am. Corp.</i>, 2012 WL 1497489, at *1, *2 (N.D. Cal. Apr. 27, 2012) (granting motion to seal "employee-identifying information" because "[e]mployees and former employees who are not parties to this litigation have</p>	<p>To Snap's knowledge, no party has previously sought to seal this specific information.</p>

privacy interests in their personnel information, and in other sensitive identifying information”) (Gonzalez Rogers, J.); *see also, e.g., Am. Auto. Ass’n of N. California, Nevada & Utah v. Gen. Motors LLC*, 2019 WL 1206748, at *2 (N.D. Cal. Mar. 14, 2019); *Opperman v. Path, Inc.*, 2017 WL 1036652, at *4 (N.D. Cal. Mar. 17, 2017); *Hunt v. Cont’l Cas. Co.*, 2015 WL 5355398, at *2 (N.D. Cal. Sept. 14, 2015). Sealing this information is consistent with the Court’s approach to sealing employee names in the Personal Injury Plaintiffs’ Master Complaint and the multistate Attorney General Complaint. *See* ECF No. 189; Case No. 4:23-cv-05448-YGR, ECF No. 77. Sealing this information is further warranted to

			<p>protect the employees' safety. <i>Cf. Campbell v. Grounds</i>, 2022 WL 14151744, at *1 (N.D. Cal. Oct. 24, 2022) (sealing witness name and finding standard met when disclosure "could put at risk the safety of one or more individuals if made public").</p> <p>Declaration of Jennifer Boden ¶¶ 2–4</p>	
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II. Documents for Which Defendants' Requested Redactions Are Disputed

Document	Portion to be Sealed	Designating Party	Whether Previously Sealed
Plaintiffs' Response to Defendants' Motion to Exclude General Causation Testimony of Plaintiffs' Experts, ECF 2404 – Ex. 2	Names of employees appearing at pages 102, 540-41	Meta	This Court has previously granted motions to seal the names of non-parties and non-executive employees to protect their privacy. <i>See</i> ECF Nos. 735, 189, 1465, 1619, 2522.
Plaintiffs' Response to Defendants' Motion to Exclude General Causation Testimony of Plaintiffs' Experts, ECF 2404 – Ex. 7	Names of employees appearing at pages 15, 17-19, 101-05 (including footnotes)	Meta	See above
Plaintiffs' Response to Defendants' Motion to Exclude General Causation Testimony of Plaintiffs' Experts, ECF 2404 – Ex. 10	Names of employees appearing at pages 4, 24, 26-29, 31-37, 42, 76, 88-89, 91-93, 100, 129, 151, 164-68 (including footnotes)	Meta	See above
Plaintiffs' Response to Defendants' Motion to Exclude General	Name of employees appearing at pages 19,	Meta	See above

1	Causation Testimony of Plaintiffs' Experts, ECF 2404 – Ex. 12	21-22, 26-28, 46-48 (including footnotes)		
2	Plaintiffs' Response to Defendants' Motion to Exclude General Causation Testimony of Plaintiffs' Experts, ECF 2404 – Ex. 15	Names of employees appearing at pages 26, 29, 31, 74-81, 83, 85-87, 107, 109, 115-116, 120, 123-127, 129-30, 144-45, 166-67, 169, 175-176, 185, 188, 199-203, 215, 221, 223-225, 230, 237-38, 241-42, 260, 262-63, 290-291, 293-296, 297-302, 306-12, 350-51, 353, 355-358, 360-361, 363, 370, 381, 401, 404, 797-98, 816-18	Meta	See above
3	Plaintiffs' Response to Defendants' Motion to Exclude General Causation Testimony of Plaintiffs' Experts, ECF 2404 – Ex. 18	Names of employees appearing at pages 4, 72, 213, 215	Meta	See above
4	Plaintiffs' Response to Defendants' Motion to Exclude General Causation Testimony of Plaintiffs' Experts, ECF 2404 – Ex. 24	Names of employees appearing at pages 45, 80-81, 95-96, 108-110, 130-31, 201, 210-11, 215650-52	Meta	See above
5	Plaintiffs' Response to Defendants' Motion to Exclude General Causation Testimony of Plaintiffs' Experts, ECF 2404 – Ex. 32	Names of employees appearing at pages 156, 158, 160-162, 329-330, 336-47, 349-361, 365-68, 385-89, 392-94, 560-61	Meta	See above
6	Plaintiffs' Response to Defendants' Motion to Exclude General Causation Testimony of Plaintiffs' Experts, ECF 2404 – Ex. 50	Names of employees appearing at pages 31-32, 34, 38, 40, 44-45, 49, 81-87, 200-01, 207, 210, 255	Meta	See above
7	Plaintiffs' Response to Defendants' Motion to Exclude General Causation Testimony of Plaintiffs' Experts, ECF 2404 – Ex. 51	Names of employees appearing at pages 157-58, 160, 162-63, 170, 406-08, 411, 436-37, 461	Meta	See above
8	Plaintiffs' Response to Defendants' Motion to Exclude General Causation Testimony of Plaintiffs' Experts, ECF 2404 – Ex. 56	Names of employees appearing at pages 65, 163170-75	Meta	See above

1	Plaintiffs' Response to Defendants' Motion to Exclude General Causation Testimony of Plaintiffs' Experts, ECF 2404 – Ex. 59	Names of employees appearing at pages 110-13, 118-30, 132-56, 163-66, 171-84, 188-90, 286	Meta	See above
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3				
4	Plaintiffs' Response to Defendants' Motion to Exclude General Causation Testimony of Plaintiffs' Experts, ECF 2404 – Ex. 62	Names of employees appearing at pages 854, 1015-17, 1025-27, 1034-38, 1044-47, 1050-52, 1065, 1077-80, 1095-1100, 1102-08, 1113-16, 1135-38, 1148-52, 1157-59, 1168-74, 1179-80	Meta	See above
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9	Plaintiffs' Response to Defendants' Motion to Exclude General Causation Testimony of Plaintiffs' Experts, ECF 2404 – Ex. 63	Names of employees appearing at pages 21, 48, 93, 373, 375, 852, 1105, 1107 1144-46, 1148, 1155-57, 1163-67, 1173-75, 1178-80, 1204-06, 1222-35, 1239-42, 1260-64, 1273-75, 1275-83, 1292-93, 1295-97, 1302-04	Meta	See above
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14	Plaintiffs' Response to Defendants' Motion to Exclude General Causation Testimony of Plaintiffs' Experts, ECF 2404 – Ex. 67	Names of employees appearing at slides 1, 8-9, 21-22, 35, 40 50	Meta	See above
15				
16				
17	Plaintiffs' Response to Defendants' Motion to Exclude General Causation Testimony of Plaintiffs' Experts, ECF 2404 – Ex. 76	Names of employees appearing at pages 486, 498	Meta	See above
18				
19				
20	Plaintiffs' Response to Defendants' Motion to Exclude General Causation Testimony of Plaintiffs' Experts, ECF 2404 – Ex. 90	Names of employees appearing at pages 8-9, 57, 75-77, 79-80, 92-94, 96, 98 110, 144, 245, 257, 283-84, 286, 293, 327, 441, 444, 446, 461, 476-78, 492, 498, 520, 594-95, 597, 600-01, 649-50, 653-55, 664, 703, 705, 719, 723-24, 727-31, 759, 786, 788-89, 791, 794, 796, 852-53, 882-83, 887, 1094-95, 1098-99, 1106-08, 1034-35, 1050-51, 1055, 1059,	Meta	See above
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	1111, 1117, 1125-28, 1131-32, 1177-79, 1195 Names of Facebook/Instagram accounts that belong to non-party individuals including minors, appearing at pages 225, 397, 929-31		
Plaintiffs' Response to Defendants' Motion to Exclude General Causation Testimony of Plaintiffs' Experts, ECF 2404 – Ex. 91	Names of employees appearing at pages 0085, 0087-91, 0093- 95	Meta	See above
Plaintiffs' Response to Defendants' Motion to Exclude General Causation Testimony of Plaintiffs' Experts, ECF 2404 – Ex. 93	Names of employees appearing at pages 15, 31, 116, 144, 147, 208	Meta	See above
Plaintiffs' Opposition to Rule 702 Motion to Exclude (School District Experts), ECF 2407 – Ex. 1	Names of employees appearing at pages 29, 31, 74-75, 77-81, 83, 85, 86-87, 107, 115-16, 120, 123-27, 129-30, 144-45, 166-67, 169, 175-76, 185, 188, 199- 202, 215, 221, 223-25, 230, 237-38, 241-42, 262-63, 290-91, 293- 99, 300-02, 306-12, 350-51, 353, 355-58, 360-63, 370, 381, 401, 404	Meta	See above
Plaintiffs' Opposition to Rule 702 Motion to Exclude (School District Experts), ECF 2407 – Ex. 3	Names of employees appearing at pages 24, 26-29, 31-37, 42, 151 164-68	Meta	See above
Plaintiffs' Opposition to Rule 702 Motion to Exclude (School District Experts), ECF 2407 – Ex. 5	Names of employees appearing at pages 1015-17, 1025-27, 1034-38, 1044-47, 1050-52, 1077-80, 1095-1100, 1102-08, 1113-16, 1135-38, 1148-52, 1157-59, 1168-70, 1171-74, 1179-80	Meta	See above

1	Plaintiffs' Opposition to Rule 702 Motion to Exclude (Section 230), ECF 2408 – Ex. 1	Names of employees appearing at pages 19, 21-22, 26-28, 46-48 (including footnotes)	Meta	See above
2				
3	Plaintiffs' Opposition to Rule 702 Motion to Exclude (Section 230), ECF 2408 – Ex. 6	Name of employee appearing at page 50	Meta	See above
4				
5	Plaintiffs' Opposition to Rule 702 Motion to Exclude (Section 230), ECF 2408 – Ex. 3	Sealed in its entirety	TikTok	To TikTok's knowledge, no party has previously sought to seal this information
6				
7	Harford School District Opposition to Motion for Summary Judgment, ECF 2395 – Ex. 16	Names of employees appearing at pages 29, 31, 74-75, 77-81, 83, 85-87, 107, 115-116, 120, 123-127, 129-130, 144-145, 166-167, 169, 175-176, 185, 188, 199-202, 215, 221, 223-225, 230, 237-238, 241-242, 260, 262-263, 290-291, 293-302, 306-312, 350-351, 353, 355-358, 360-361, 363, 370, 381, 401, 404	Meta	This Court has previously granted motions to seal the names of non-parties and non-executive employees to protect their privacy. <i>See</i> ECF Nos. 735, 189, 1465, 1619, 2522.
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14	Plaintiffs' Corrected Omnibus Opposition to Defendants' Motions for Summary Judgment, ECF 2414-1	Names of employees appearing at pages 14 (line 6), 63 (line 20), 75 (line 12), 88 (line 10)	Meta	See above
15				
16	Plaintiffs' Corrected Omnibus Opposition to Defendants' Motions for Summary Judgment, ECF 2414-1	Employee identifying information P. 12, lines 13-15 P. 78, lines 3-4 p. 78, lines 7, 9, 12-13 p. 79, lines 21-22 p. 80, lines 5, 7, 9-12 p. 81, lines 4-5 p. 81, lines 17-21 p. 82, lines 1-2 p. 86, lines 15-17 p. 87, lines 24-25 p. 88, lines 3-4, 10, 15 p. 89, lines 24, 26 p. 90, lines 6, 8 p. 91, lines 24-25 p. 94, lines 16-19, 24-26 p. 95, lines 17-18 p. 96, lines 18, 19, 21, 24, 25, 27	TikTok	To TikTok's knowledge, no party has previously sought to seal this information
17				
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	<p>p. 97 lines 27-28</p> <p>p. 98, lines 11-16</p> <p>p. 100, lines 13, 16, 20-22</p> <p>p. 106, lines 4-9, 24-25</p> <p>p. 107, line 13</p> <p>p. 111, lines 7, 9-14, 20-28</p> <p>p. 112, lines 1, 2, 16-18</p> <p>p. 113, lines 4, 6</p>		
Plaintiffs' Corrected Omnibus Opposition to Defendants' Motions for Summary Judgment, ECF 2414-1	<p>User data / operational metrics</p> <p>p. 78, lines 17, 19-20</p> <p>p. 79, line 5</p> <p>p. 80, line 24</p> <p>p. 81, lines 7-13, 16-17</p> <p>p. 81, line 23</p> <p>p. 82, line 3, 7, 9, 11-14</p> <p>p. 91, line 23</p> <p>p. 92, line 24</p> <p>p. 93, lines 1, 7</p> <p>p. 94, line 4</p> <p>p. 98, line 19</p> <p>p. 100, lines 21-23</p> <p>p. 101, line 2</p> <p>p. 101, lines 22-23</p> <p>p. 102, lines 3, 7</p> <p>p. 107, line 5</p> <p>p. 107, lines 15, 17</p> <p>p. 109, line 6</p> <p>p. 114, lines 3, 8-9, 11</p>	TikTok	To TikTok's knowledge, no party has previously sought to seal this information
Plaintiffs' Corrected Omnibus Opposition to Defendants' Motions for Summary Judgment, ECF 2414-1	<p>Description of internal proprietary processes</p> <p>p. 90, lines 16-19</p> <p>p. 106 lines 15-17, 22</p> <p>p. 108, lines 19-20</p> <p>p. 114, line 24</p>	TikTok	To TikTok's knowledge, no party has previously sought to seal this information
Plaintiffs' Corrected Omnibus Opposition to Defendants' Motions for Summary Judgment, ECF 2414-1	<p>Revenue and financial information</p> <p>p. 78, lines 4-5</p> <p>p. 80, lines 18-19</p> <p>p. 81, lines 22</p> <p>p. 82, line 14</p> <p>p. 85, lines 22-25</p> <p>p. 95, line 28 - p. 96 line 1</p> <p>p. 96, line 14</p> <p>p. 107, line 11</p>	TikTok	To TikTok's knowledge, no party has previously sought to seal this information

1	Plaintiffs' Corrected Omnibus Opposition to Defendants' Motions for Summary Judgment, ECF 2414-1	Proprietary Information Related To Third Parties p. 83, lines 15-18 p. 84, lines 26-27 p. 85, lines 1, 9-10	TikTok	To TikTok's knowledge, no party has previously sought to seal this information
2				
3				
4	Plaintiffs' Corrected Omnibus Opposition to Defendants' Motions for Summary Judgment, ECF 2414-1	Third party identifying information p. 82, lines 8, 11 p. 87, line 13 p. 92, line 13	TikTok	To TikTok's knowledge, no party has previously sought to seal this information
5				
6				
7	Plaintiffs' Corrected Omnibus Opposition to Defendants' Motions for Summary Judgment, ECF 2413	Page 159, Lines 19 and 20: Specific dollar figures.	YouTube	To YouTube's knowledge, no party has previously sought to seal this information
8				
9				
10	Plaintiffs' Corrected Omnibus Opposition to Defendants' Motions for Summary Judgment, ECF 2413	Page 160, Lines 24 and 25: Specific dollar figures.	YouTube	See above
11				
12				
13				
14	Plaintiffs' Corrected Omnibus Opposition to Defendants' Motions for Summary Judgment, ECF 2413	Page 166, Line 18: Specific number of "underage accounts" and specific precision figure.	YouTube	See above
15				
16				
17	Plaintiffs' Corrected Omnibus Opposition to Defendants' Motions for Summary Judgment, ECF 2413	Page 168, Lines 22 and 23: Name of internal testing system, specific number of "changes" made to a product feature, and resulting impact to percentage increase in product engagement metric.	YouTube	See above
18				
19				
20				
21				
22	Plaintiffs' Corrected Omnibus Opposition to Defendants' Motions for Summary Judgment, ECF 2413	Page 173, Lines 17–18: Full sentence after "scope," explaining operation of age detection system.	YouTube	See above
23				
24				
25		Page 173, Line 19: Words between "classifier" and "and," providing details on the scope of activity		
26				
27				
28				

1	covered by age		
2	detection system.		
3	Page 173, Line 20: All		
4	words before “ <i>See</i> ” and		
5	the last word, providing		
6	details on the scope of		
7	activity covered by age		
8	detection system.		
9	Page 173, Line 21: Full		
10	line, providing details		
11	on the operation of age		
12	detection system.		
13	Page 173, Line 22: All		
14	words before “ <i>Third</i> ”		
15	and the word between		
16	“include” and “in,”		
17	providing details on the		
18	scope of activity		
19	covered by age		
20	detection system.		
21	Page 173, Line 23:		
22	Words between “a” and		
23	“ <i>Id</i> ,” providing details		
24	related to the scope of		
25	activity covered by age		
26	detection system.		
27	Page 173, Line 24:		
28	Word between		
	“include” and “in,”		
	providing details		
	related to internal		
	discussions concerning		
	the scope of activity		
	covered by age		
	detection system.		
	Page 173, Line 26:		
	Specific percentage		
	relating to scope of		
	activity covered by age		
	detection system.		

	Page 173, Line 28: Words between “lowered” and “Ex.” relating to scope of activity covered by age detection system.		
Plaintiffs’ Corrected Omnibus Opposition to Defendants’ Motions for Summary Judgment, ECF 2413	<p>Page 174, Line 1: Specific percentage</p> <p>Page 174, Line 7: All words after “generally,” revealing internal communications relating to the operation of the age detection system.</p> <p>Page 174, Line 8: All words before “Ex.” revealing internal communications relating to the operation of the age detection system.</p> <p>Page 174, Lines 9–10: Quotation providing details related to the operation of the age detection system. Page 174, Line 11: Words between “The” and “therefore,” relating to the operation of the age detection system.</p> <p>Page 174, Line 12–13: Words between “platform” and “and thus,” relating to the operation of the age detection system.</p>	YouTube	See above
Plaintiffs’ Corrected Omnibus Opposition to Defendants’ Motions	Page 176, lines 20 and 21: Specific dollar figures.	YouTube	See above

for Summary Judgment, ECF 2413			
Plaintiffs' Opposition to Defendants' Harford Motion for Summary Judgment, ECF 2400-18 – Ex. 16 (Christakis MDL Expert Report)	Page 58, Paragraph 111: Employee name. Page 136, Paragraph 233: Employee name. Page 314, Paragraph 522: Employee name.	YouTube	See above
Plaintiffs' Opposition to Defendants' Motion to Exclude Plaintiffs' General Causation Experts, Dkt. 2405-18 – Ex. 15 (Christakis MDL Expert Report)	Page 58, Paragraph 111: Employee name. Page 136, Paragraph 233: Employee name. Page 314, Paragraph 522: Employee name.	YouTube	See above
Plaintiffs' Opposition to Defendants' Motion to Exclude Plaintiffs' General Causation Experts, ECF 2405-13 – Ex. 10 (Lembke MDL Expert Report)	Page 57: Employee name.	YouTube	See above
Plaintiffs' Opposition to Defendants' Motion to Exclude Plaintiffs' General Causation Experts, ECF 2405-21 – Ex. 18 (Lembke MDL Deposition Transcript)	Page 318, Line 21: Employee name. Page 320, Line 5: Employee name. Page 320, Line 8: Employee name.	YouTube	See above
Plaintiffs' Opposition to Defendants' Motion to Exclude Plaintiffs' General Causation Experts, ECF 2405-35 – Ex. 32 (Murray MDL Expert Report)	Pages 176 and 177, Paragraph 355: Employee name. Pages and 178, Paragraph 356: Employee name. Pages 181 and 182, Paragraph 361: Employee name.	YouTube	See above

	Page 182 and 183, Paragraph 362: Employee name.		
Plaintiffs' Opposition to Defendants' Motion to Exclude Plaintiffs' School District Experts, ECF 2407-03 – Ex. 1 (Christakis MDL Expert Report)	Page 58, Paragraph 111: Employee name. Page 136, Paragraph 233: Employee name. Page 314, Paragraph 522: Employee name.	YouTube	See above
Plaintiffs' Opposition to Defendants' Motion to Exclude Plaintiffs' School District Experts, ECF 2407-05 – Ex. 10 (Lembke MDL Expert Report)	Page 57: Employee name.	YouTube	See above
Plaintiffs' Opposition to Defendants' Harford Motion for Summary Judgment, ECF 2400- 18 – Ex. 16 (Christakis MDL Expert Report)	Page 96: Employee name Page 97: Twitter user account names contained in embedded image Page 147: Employee name; Twitter user name	Snap	To Snap's knowledge, no party has previously sought to seal this specific information.
Plaintiffs' Opposition to Defendants' Motion to Exclude Plaintiffs' General Causation Experts, ECF 2405-18 – Ex. 15 (Christakis MDL Expert Report)	Page 96: Employee name Page 97: Twitter user account names contained in embedded image Page 147: Employee name; Twitter user name	Snap	To Snap's knowledge, no party has previously sought to seal this specific information.
Plaintiffs' Opposition to Defendants' Motion to Exclude Plaintiffs' General Causation Experts, ECF 2405-13 – Ex. 10 - Lembke MDL Expert Report)	Page 46: Employee name Page 47: Employee names Page 54: Employee name	Snap	To Snap's knowledge, no party has previously sought to seal this specific information.

1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25 26 27 28	Plaintiffs' Opposition to Defendants' Motion to Exclude Plaintiffs' General Causation Experts, ECF 2405-35 – Ex. 32 (Murray MDL Expert Report)	Page 169: Employee name	Snap	To Snap's knowledge, no party has previously sought to seal this specific information.
	Plaintiffs' Opposition to Defendants' Motion to Exclude Plaintiffs' General Causation Experts, ECF 2405-33 – Ex. 30 (Deposition of Stuart Murray, June 19, 2025)	504:1 Employee name 504:8 Employee name	Snap	To Snap's knowledge, no party has previously sought to seal this specific information.
	Plaintiffs' Opposition to Defendants' Motion to Exclude Plaintiffs' School District Experts, ECF 2407-03 – Ex. 1 (Christakis MDL Expert Report)	Page 96: Employee name Page 97: Twitter user account names contained in embedded image Page 147: Employee name; Twitter user name	Snap	To Snap's knowledge, no party has previously sought to seal this specific information.
	Plaintiffs' Opposition to Defendants' Motion to Exclude Plaintiffs' School District Experts, ECF 2407-05 – Ex. 3 (Lembke MDL Expert Report)	Page 46: Employee name Page 47: Employee names Page 54: Employee name	Snap	To Snap's knowledge, no party has previously sought to seal this specific information.

1 Dated: December 10, 2025

2 **COVINGTON & BURLING LLP**

3 /s/ Ashley M. Simonsen

4 ASHLEY M. SIMONSEN (Bar No. 275203)

5 COVINGTON & BURLING LLP

6 1999 Avenue of the Stars

7 Los Angeles, California 90067

8 Telephone: (424) 332-4800

9 Facsimile: (424) 332-4749

10 Email: asimonsen@cov.com

11 PHYLLIS A. JONES (*pro hac vice*)

12 PAUL W. SCHMIDT (*pro hac vice*)

13 CHRISTIAN J. PISTILLI (*pro hac vice*)

14 COVINGTON & BURLING LLP

15 One City Center

16 850 Tenth Street, NW

17 Washington, DC 20001-4956

18 Telephone: (202) 662-6000

19 Facsimile: (202) 662-6291

20 Email: pajones@cov.com

21 Email: pschmidt@cov.com

22 Email: cpistilli@cov.com

23 *Attorneys for Defendants Meta Platforms, Inc. f/k/a*

24 *Facebook, Inc.; Facebook Holdings, LLC;*

25 *Facebook Operations, LLC; Meta Payments Inc.*

26 *f/k/a Facebook Payments Inc.; Meta Platforms*

27 *Technologies, LLC f/k/a Facebook Technologies,*

28 *LLC; Instagram, LLC; and Siculus LLC f/k/a*

Siculus, Inc.

WILLIAMS & CONNOLLY LLP

/s/ Joseph G. Petrosinelli

JOSEPH G. PETROSINELLI, *pro hac vice*

jpetrosinelli@wc.com

ASHLEY W. HARDIN, *pro hac vice*

ahardin@wc.com

J. ANDREW KEYES, *pro hac vice*

akeyes@wc.com

NEELUM J. WADHWANI (SBN 247948)

nwadhwani@wc.com

WILLIAMS & CONNOLLY LLP

680 Maine Avenue SW

Washington, DC 20024

Tel.: (202) 434-5000

*Attorneys for Defendants YouTube, LLC and
Google LLC*

KING & SPALDING LLP

/s/ Geoffrey M. Drake

GEOFFREY M. DRAKE, *pro hac vice*

gdrake@kslaw.com

TACARA D. HARRIS, *pro hac vice*

tharris@kslaw.com

KING & SPALDING LLP

1180 Peachtree Street, NE, Suite 1600

Atlanta, GA 30309

Telephone: (404) 572-4600

Facsimile: (404) 572-5100

DAVID P. MATTERN, *pro hac vice*

dmattern@kslaw.com

KING & SPALDING LLP

1700 Pennsylvania Avenue, NW

Suite 900

Washington, D.C. 20006

Telephone: (202) 737-0500

Facsimile: (202) 626-3737

BAILEY J. LANGNER (SBN 307753)

blangner@kslaw.com

KING & SPALDING LLP

50 California Street, Suite 3300

San Francisco, CA 94111

Telephone: (415) 318-1200

Facsimile: (415) 318-1300

Attorneys for Defendants TikTok Inc., ByteDance

Inc., ByteDance Ltd., TikTok Ltd., and TikTok, LLC

KIRKLAND & ELLIS LLP

/s/ Allison Brown

ALLISON BROWN, *pro hac vice*

alli.brown@kirkland.com

KIRKLAND & ELLIS LLP

2005 Market Street, Suite 1000

Philadelphia, PA 19103

Tel.: (215) 268-5000

JESSICA DAVIDSON, *pro hac vice*

jessica.davidson@kirkland.com

JOHN J. NOLAN, *pro hac vice*

jack.nolan@kirkland.com

KIRKLAND & ELLIS LLP

601 Lexington Avenue

New York, NY 10022

Tel.: (212) 446-4800

MUNGER, TOLLES & OLSON LLP

JONATHAN H. BLAVIN (State Bar No. 230269)

Jonathan.Blavin@mto.com

MUNGER, TOLLES & OLSON LLP

560 Mission Street, 27th Floor

San Francisco, CA 94105

Tel: (415) 512-4000

VICTORIA A. DEGTYAREVA (State Bar No.
284199)

Victoria.Degtyareva@mto.com

MUNGER, TOLLES & OLSON LLP

350 South Grand Avenue, 50th Floor

Los Angeles, CA 90071

Tel.: (213) 683-9100

Facsimile: (213) 687-3702

Attorneys for Defendant Snap Inc.

1 By: /s/ Previn Warren
2 PREVIN WARREN
3 **MOTLEY RICE LLC**
4 401 9th Street NW Suite 630
5 Washington DC 20004
6 Telephone: 202-386-9610
7 pwarren@motleyrice.com

8 LEXI J. HAZAM
9 **LIEFF CABRASER HEIMANN &**
10 **BERNSTEIN, LLP**
11 275 Battery Street, 29th Floor
12 San Francisco, CA 94111-3339
13 Telephone: 415-956-1000
14 lhazam@lchb.com

15 *Co-Lead Counsel for Plaintiffs*
16
17
18
19
20
21
22
23
24
25
26
27
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ATTESTATION

I, Ashley M. Simonsen, hereby attest, pursuant to N.D. Cal. Civil L.R. 5-1, that concurrence to the filing of this document has been obtained from each signatory hereto.

Dated: December 10, 2025

By: /s/ Ashley M. Simonsen

Ashley M. Simonsen